

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SQUARE D COMPANY and SCHNEIDER  
ELECTRIC, S.A.,

Plaintiffs,

v.

ELECTRONIC SOLUTIONS, INC., and  
WILLIAM AMBROS,

Defendants.

CASE NO.: 07 C 6294

Judge James B. Moran

**AFFIDAVIT OF CHRISTOPHER T. SHEEAN**

I, Christopher T. Sheean, being duly sworn on oath, depose and state in support of Plaintiffs Motion to Open Discovery, Compel Production of Purchase and Sale Records and Award Sanctions:

1. I am a partner at Wildman, Harrold, Allen & Dixon LLP, and have been retained to represent the Plaintiffs in this action. I have personal knowledge of the matters contained in this affidavit..

2. In conjunction with our representation of Plaintiffs in this action, I traveled to Plant City, Florida on April 30, 2008 to conduct an inspection of defendants' inventory bearing the trademarks Square D®, Scheider Electric®, Telemecanique®, or Merlin Gerin®.

3. My travel costs for this trip were \$537.40. My expense report for the trip is attached hereto as Exhibit 1.

4. I spent 18.2 hours total time in preparing for the inspection, conducting the inspection, communicating with my client regarding the findings of the inspection, and preparing the instant motion. My billable rate is \$475, a rate that is consistent with a litigation partner of

comparable experience in Chicago, Illinois. The total amount for my fees for the inspection and the instant motion total \$8,645.00.

5. Mr. Jeff Miller of Schneider Electric traveled from Raleigh, N.C. and joined me for the inspection, based on his knowledge and experience with Telemecanique® Contactors. Mr. Miller's travel expenses were \$310.04. (See the May 14, 2008 email from Mr. Miller, attached as Exhibit 2).

6. Mr. James Renie also traveled from Raleigh, N.C. and accompanied me on the inspection, based on his knowledge and experience with circuit breakers and sensors. Mr. Renie's travel expenses for the inspection were \$320.45. (See the May 14, 2008 email from Mr. Renie detailing his expenses, attached as Exhibit 3).

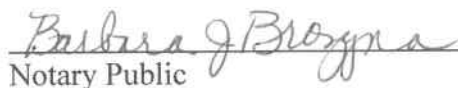
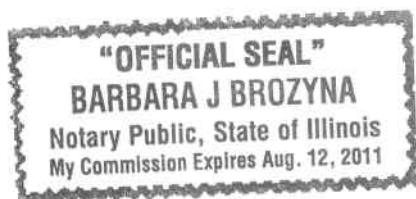
7. I retained Verasys LLC to assist in the imaging and analysis of electronic records on the computers of Defendants. Mr. Jesus Peña of Verasys traveled from Miami, FL and accompanied me on the inspection. The fees and expenses for Verasys were \$2,271.50. (An invoice from Verasys for the work is attached as Exhibit 4).

Further affiant sayeth not. I affirm, under the penalties for perjury, that the foregoing representations are true.



Christopher T. Sheean

SUBSCRIBED AND SWORN TO  
before me this 14<sup>th</sup> day of May, 2008.

  
Notary Public

Attorney Billing No.: 1402

To: 04/30/08

[illegible]

		CLIENT CHARGES			OFFICE CHARGES (1)			PPA		
	Client Name \ Description of Charge	Client/ Matter #	Amount	Entertainment (2)	Mgmt. Approval	Other	Entertainment (2)	Asset Purchases	Other	
Date	Doc. # 1834364									
				</						

Signature:

*This signature affirms that all expenses listed above are related to the business activity of the firm.*

ADVANCES (date & amount):

\$	\$	\$
\$	\$	\$
\$	\$	\$

**Sheean, Christopher**

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**From:** jeff-raleigh.miller@us.schneider-electric.com  
**Sent:** Wednesday, May 14, 2008 8:36 AM  
**To:** Sheean, Christopher  
**Subject:** Re: ESI Inspection



pic32365.jpg (171 KB)

Chris,

Mine was \$298.04, but add \$12.00 to that for a airline reporting charge so the total is \$310.04.

(Embedded image moved to file: pic32365.jpg)

Regards,  
Jeff

"Sheean, Christopher"  
<sheean@wildman.com>

To 05/13/2008 05:30 PM <jeff-raleigh.miller@us.schneider-electric.com>  
cc <jim.renie@us.schneider-electric.com>,  
"Jesus Pena" <jpena@dynasite.com>  
Subject ESI Inspection

Jeff,

Could you please send me the total amount of your travel expenses for the inspection?

Thanks,

Chris

Christopher T. Sheean  
Wildman Harrold Allen & Dixon LLP  
225 W. Wacker Drive

Suite 2800  
Chicago, Illinois 60606  
T: (312) 201-2997  
F: (312) 416-4659  
sheean@wildman.com

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This email has been scanned for SPAM content and Viruses by the MessageL abs Email Security System.

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**From:** jim.renie@us.schneider-electric.com  
**Sent:** Wednesday, May 14, 2008 7:01 AM  
**To:** Sheean, Christopher  
**Subject:** Re: ESI/Square D

Jim Renie - ER00283246 (submitted to Tracy Garner)

Airfare - \$255.00  
Travel Agency Fee - \$12.00  
Parking - \$10.00  
Lunch - \$27.29  
Mileage - \$16.16

Total - \$320.45

James C Renie  
Sales and Marketing Alignment  
Automation & Control - Schneider Electric  
8001 Knightdale Blvd  
919-266-8608 - Office  
919-696-3591 - Cell  
jim.renie@us.schneider-electric.com  
AOL Instant Messenger - JCRENIE





66 West Flagler  
Suite 401  
Miami, FL 33130

# Invoice

Date	Invoice #
5/14/2008	3332

Bill To
Wildman Harrold LLP Brian Lewis 225 W. Wache Dr. Suite 3000 Chicago, Illinois 60606

Tax ID # 16-1667634	Terms	P.O. No.	Project
	Due on receipt	Square D	W07-06-0742

Quantity	Description	Rate	Amount
8	JP- April 30, 2008: Forensic imaging, verification, and backup- Plant City	225.00	1,800.00
1	JP- May 7, 2008: Research computer. Files access dated verification. Search for documents related to ESI, Source Automation and Pushbuttonsdirect.	225.00	225.00
	SUBTOTAL		2,025.00
	Administrative Fees @6%	6.00%	121.50
	One 240GB (Hard Disk Storage)	125.00	125.00
	Tax	7.00%	0.00
		<b>Total</b>	\$2,271.50

License No.  
A 2300109

Phone #	Fax #	Web Site
305-373-8488	305-373-8489	www.verasysllc.com